

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></div> <div>Debtors.<sup>1</sup></div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 4780-LTS</div>
<div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, and PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY,</div> <div>Movants,</div> <div>v.</div> <div>OFFICIAL COMMITTEE OF UNSECURED CREDITORS, <i>et al.</i></div> <div>Respondents.</div>	

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

**URGENT JOINT MOTION FOR LEAVE TO FILE OPPOSITION TO URGENT MOTION IN LIMINE TO EXCLUDE TESTIMONY OFFERED BY UNION DE TRABAJADORES DE LA INDUSTRIA ELECTRICA Y RIEGO (UTIER), SISTEMA DE RETIRO DE LOS EMPLEADOS DE LA AUTORIDAD DE ENERGIA ELECTRICA (SREAEE), AND WINDMAR RENEWABLE ENERGY**

Unión de Trabajadores de la Industria Eléctrica y Reigo (“UTIER”) and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE”) through its undersigned counsels, hereby respectfully file this motion to request leave to file a Joint Motion in Opposition to Urgent Motion In Limine to Exclude Testimony Offered by Union de Trabajadores de la Industria Electrica y Riego (UTIER), Sistema de Retiro de los Empleados de la Autoridad de Energia Electrica (SREAEE), and Windmar Renewable Energy. In support of this remedy, UTIER and SREAEE state as follows:

1. On June 6, 2019, at the Financial Oversight and Management Board for Puerto Rico (“Oversight Board”), in its capacity as representative of the Puerto Rico Electric Power Authority (“PREPA”) pursuant to Section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), filed an *Urgent Motion In Limine to Exclude Testimony Offered by Union de Trabajadores de la Industria Electrica y Riego (UTIER), Sistema de Retiro de los Empleados de la Autoridad de Energia Electrica (SREAEE), and Windmar Renewable Energy* (Docket No. 1301, Case No. 17-04780).

2. On June 8, 2019, this Honorable Court issued an *Order Setting Briefing Schedule* (Docket No. 7336, Case No. 17-03283). As such, this Court granted until Tuesday, June 11, 2019 at 10:00a.m. (AST) to file the oppositions to the Motions in Limine.

3. Due to several professional compromises of the undersigned counsels, it was not possible to file the corresponding opposition to the Motion In Limine before the due date set by this Honorable Court.

4. The Opposition to the Motion in Limine is fully drafted. On June 5<sup>th</sup>, 2019, UTIER and SREAEE sent a letter to counsels for the Oversight Board stating their respective positions in terms of the merits and need of the witnesses listed for 9010 Motion. Its contents are the same arguments presented in the Opposition to the Motion in Limine. Therefore, counsel for the Oversight Board had full knowledge of UTIER and SREAEE's position with regards to this matter.

5. As such, the request for leave to file the Opposition to the Motion in Limine a few hours past the due date does not cause any harm to the Oversight Board.

6. This request is not intended to unduly delay the proceedings. It only serves the legitimate interest of UTIER and SREAEE of submitting their positions before this Honorable Court in order for them to be discussed on the Hearing of June 12, 2019.

**WHEREFORE**, UTIER and SREAEE respectfully request that the Court take notice of above mentioned and grant leave to file the Opposition to the Motion in Limine on this same date.

In Ponce, Puerto Rico, this 11<sup>th</sup> day of June 2019.

**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. Paper copies have been mailed pursuant to Section II of the *Third Amended Notice, Case Management and Administrative Procedures*:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to the chambers):  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212  
New York, New York 10007-1312;
- (ii) Office of the United States Trustee for Region 21

Edificio Ochoa, 500 Tanca Street, Suite 301  
San Juan, PR 00901-1922



472 Tito Castro Ave.,  
Marvesa Building Suite 106,  
Ponce, PR 00716  
Tel: (787) 848-0666  
Fax: (787) 841-1435

/s/Rolando Emmanuelli Jiménez  
USDC: 214105

/s/ Jessica E. Mendez Colberg  
USDC: 302108

Emails: rolando@bufete-emmanuelli.com  
jessica@bufete-emmanuelli.com  
notificaciones@bufete-emmanuelli.com